



March 2, 2015

Via ECF

The Honorable Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Rm. N208  
Brooklyn, New York 11201

Re: *Gigantino v. Turner Construction, et al.*  
Civil No. 14-3619  
GS File No. 4106.0008

Dear Judge Reyes,

We represent Defendants Turner Construction Company and Delta Airlines, Inc. (hereinafter "Defendants") in the above-referenced Labor Law matter. We submit this joint letter on behalf of all parties requesting a modification of the current scheduling order.

This is the second request for an extension and anticipates a thirty day extension on the current liability discovery scheduling deadlines. This second extension is respectfully requested because the handling attorney for Defendants is on trial in Bronx County Supreme Court.

The parties respectfully request that the scheduling order be modified as follows:

- Liability fact discovery, including the parties' depositions, shall be completed on or before April 6, 2015.
- Plaintiff's liability expert(s) witness disclosures are due on or before April 20, 2015.
- Plaintiff's liability expert(s) depositions shall be completed on or before May 4, 2015.
- Defendants' liability expert(s) witness disclosures are due on or before May 18, 2015.
- Defendants' liability expert(s) depositions shall be completed on or before June 1, 2015.
- Liability discovery shall be completed on or before June 8, 2015.
- A status conference with the Court will be held on \_\_\_\_\_.
- All discovery shall be completed on or before \_\_\_\_\_.

We are available at the Court's convenience to discuss this matter further.

Respectfully submitted,  
Goldberg Segalla LLP

/s/ Laura Ashley Martin

Laura Ashley Martin

LAM

CC: Michael S. Fabiani, Esq. (via ECF)  
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